

U.S. Department  
of Transportation

United States

51417



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DOCKET SECTION

Docket Management Facility [USCG-199843021 -10  
U.S. Department of Transportation (DOT)  
Room PL-40 1  
400 Seventh Street SW.  
Washington, DC 20590-000 1

Dear Sir or Madam:

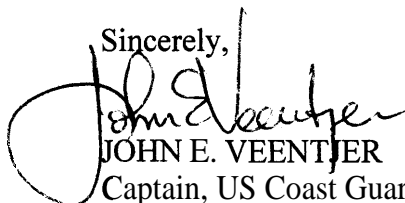
This letter is in response to the comment period dealing with shipments of Hazardous Materials at Waterfront Facilities under 33 CFR 126 (docket USCG-19984302). Having conferred with the hazardous material container inspectors within the Thirteenth District, they are in favor of the proposed changes. Specifically this office supports the changes pertaining to:

- 1) Establishment of a segregation policy for breakbulk cargo facilities similar to those required for vessels under 49 CFR 176.83.
- 2) Eliminating redundant USCG Hotwork permits for waterfront facilities and vessels moored at them, with authority resting with a state or local permit system.
- 3) Elimination of permit requirements for certain Class 1 shipments less than 40 net tons.
- 4) Requirement for facilities (that moor foreign vessels) to have international shore connections for firefighting.
- 5) Requirement for containerized hazardous cargo to not be stacked more than 4 high.
- 6) Placing the burden of marking, labeling, and placarding breakbulk material, set for transportation, on the facilities if not already done by shippers.

The Puget Sound region has had much success in the field of hazardous material transportation through the efforts of a multi agency/user Workgroup chartered by the Port of Seattle. By working with shippers and regulatory agencies, this Workgroup was successful in reaching consensus and updated sections of the Seattle Fire Department's Administrative Code to strike a balance between ensuring public safety while allowing effective commerce.

If you have any questions concerning these comments do not hesitate to call LT Jim Peschel at (206) 220-7215.

Sincerely,

  
JOHN E. VEENTJER  
Captain, US Coast Guard

By Direction of the Thirteenth District Commander

Copy: MSO Puget Sound